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November 9, 2021

Submitted via ECF

Magistrate Judge Roanne L. Mann
United States District Court – EDNY
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Goggin et al. v. JetBlue Airways
Docket: 1:20-cv-06188

Hon: Judge Mann:

The undersigned is counsel to defendant JetBlue Airways Corporation herein. I write on behalf of plaintiffs' counsel and myself pursuant to the Court's order of November 5, 2021, wherein the Court noted that the Parties had failed to report on the status of this matter by November 3, 2021. Unfortunately, both parties missed the filing deadline and hereby apologize to the Court for doing so.

Counsel are actively discussing settlement; however, at this time the parties remain far apart. In order to advance the matter within the Court's extension of the fact discovery deadline to November 29, 2021, the deposition of plaintiff Julie Goggin has been scheduled for November 22, 2021 and the deposition of plaintiffs' treating therapist is set for November 29, 2021. The defense will defer the depositions of plaintiffs Evan Goggin and C.G. Goggin while determining whether their responses to written discovery will suffice. The parties have agreed that the defense does not waive their right to take those depositions at a later date, if necessary. Counsel do not this time foresee the need for any further adjustment to the Court's schedule in this case.

Respectfully submitted,

LEADER BERKON COLAO
& SILVERSTEIN LLP

By: /s/ Arthur I. Willner
ARTHUR I. WILLNER